

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Vincent E. Harris  
Janet L. Harris

Case Number 17-35621-KRH

Chapter 13

Debtors

Address: 1304 Poco Dr Richmond, VA 23235

SSN: xxx-xx- 9499 and 3082

**OBJECTION TO PROOF OF CLAIM**

COMES NOW, Vincent E. Harris and Janet L. Harris, (“Debtors”), by counsel, and pursuant to 11 U.S.C. Rule 3007, Objection to Claim(s), Debtors object to claim number 4 filed by Toyota Motor Credit Corporation.

1. Debtors filed for protection under Chapter 13 of U.S.C. Bankruptcy Code on November 10, 2017.
2. On December 14, 2017, Toyota Motor Credit Corporation, filed secured claim number 4.
3. On February 14, 2019, Toyota Motor Credit Corporation, amended the claim to \$13,078.72, thirteen thousand and seventy-eight dollars and seventy-two cents.

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[jmassie@massielawfirm.com](mailto:jmassie@massielawfirm.com)

In re: Vincent E. Harris  
Janet L. Harris

Case Number 17-35621-KRH

Chapter 13 Debtors

4. Debtors object to claim number 4, as they believe that Toyota Motor Credit Corporation, had been more diligent in selling the vehicle the deficiency balance would have been significantly lower.
5. The Debtors are requesting that claim number 4 be reduced to \$2,500.00, two thousand and five hundred dollars and zero cents as this is a fairer and more appropriate price.

WHEREFORE, Debtors request that the Court sustain the objection.

February 12, 2021

RESPECTFULLY SUBMITTED

Vincent E. Harris  
Janet L. Harris

By: /s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)  
(804) 644-4874 (F)

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[jmassie@massielawfirm.com](mailto:jmassie@massielawfirm.com)

In re: Vincent E. Harris  
Janet L. Harris

Case Number 17-35621-KRH

Chapter 13 Debtors

**CERTIFICATE OF SERVICE**

I hereby certify that on February 12, 2021, I sent, electronically, or mailed a true and exact copy of the foregoing **Objection to Proof of Claim** to all necessary parties.

February 12, 2021

RESPECTFULLY SUBMITTED

Vincent E. Harris

Janet L. Harris

By: /s/: Joseph Massie, III

Joseph Massie, III

115 N. 1<sup>st</sup> Street

Richmond, VA 23219-2125

(804) 644-4878 (T)

(804) 644-4874 (F)

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[jmassie@massielawfirm.com](mailto:jmassie@massielawfirm.com)

In re: Vincent E. Harris  
Janet L. Harris

Case Number 17-35621-KRH

Chapter 13 Debtors

**Certificate of Mailing**

Toyota Motor Credit Corporation  
c/o Becket & Lee, LLP  
PO Box 3001  
Malvern, PA 19355-0701

American Express Trs  
Po Box 297871  
Fort Lauderdale, FL 33329

Amex  
Correspondence  
Po Box 981540  
El Paso, TX 79998

Barclays Bank Delaware  
100 S West St  
Wilmington, DE 19801

Cap1/dbarn  
Capital One Retail Srvs/Attn: Bankruptcy  
Po Box 30258  
Salt Lake City, UT 84130

Capital One  
Attn: Bankruptcy  
Po Box 30253  
Salt Lake City, UT 84130

Capital One  
Attn: General Correspondence/Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130

Cash Net USA  
P.O .Box 643990  
Cincinnati, OH 45264

Chase Card

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[jmassie@massielawfirm.com](mailto:jmassie@massielawfirm.com)

In re: Vincent E. Harris  
Janet L. Harris

Case Number 17-35621-KRH

Chapter 13 Debtors

Attn: Correspondence Dept  
Po Box 15298  
Wilmington, DE 19850

Citibank / Sears  
Citicorp Credit Services/Attn: Centraliz  
Po Box 790040  
Saint Louis, MO 63179

Citibank/The Home Depot  
Citicorp Cr Srvs/Centralized Bankruptcy  
Po Box 790040  
St Louis, MO 63129

Conrad Accpt  
476 W Vermont Ave  
Escondido, CA 92025

Dell Financial Services  
Attn: Bankruptcy  
Po Box 81577  
Austin, TX 78708

Discover Financial  
Po Box 3025  
New Albany, OH 43054

Henrico Doctor's Hospital  
P.O. Box 13620  
Richmond, VA 23225

Mid America Bank & T  
121 Continental Dr Ste 1  
Newark, DE 19713

Midland Funding  
Attn: Bankruptcy  
Po Box 939069

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[jmassie@massielawfirm.com](mailto:jmassie@massielawfirm.com)

In re: Vincent E. Harris  
Janet L. Harris

Case Number 17-35621-KRH

Chapter 13 Debtors

San Diego, CA 92193

Ocwen Loan Servicing, Llc  
Attn: Research/Bankruptcy  
1661 Worthington Rd Ste 100  
West Palm Bch, FL 33409  
Office of US Trustee  
701 E. Broad Street  
Suite 4300  
Richmond, VA 23219

Old Point National Ban  
1 W Mellen St  
Hampton, VA 23663

Suzanne E. Wade  
7202 Glen Forest Dr, Ste 202  
Richmond, VA 23226

Synchrony Bank  
Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896

Synchrony Bank/ JC Penneys  
Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896

Synchrony Bank/Amazon  
Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896

Synchrony Bank/Sams Club  
Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896

Synchrony Bank/Walmart

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[jmassie@massielawfirm.com](mailto:jmassie@massielawfirm.com)

In re: Vincent E. Harris  
Janet L. Harris

Case Number 17-35621-KRH

Chapter 13 Debtors

Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896

Toyota Motor credit Corp  
Po Box 8026  
Cedar Rapids, IA 52408

Tricom Management  
4025 E La Palma Avenue # 1 101  
Anaheim, CA 92807

Wyndham Vacation Ownership  
6277 Sea Harbor Dr  
Orlando, FL 32821

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[jmassie@massielawfirm.com](mailto:jmassie@massielawfirm.com)

In re: Vincent E. Harris  
Janet L. Harris

Case Number 17-35621-KRH

Chapter 13 Debtors